

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA**

Criminal No. 3:22-cr-9

United States of America,

Plaintiff,

vs.

Dominick Jon Ross,

Defendant.

**MOTION TO
CONTINUE TRIAL**

Dominick Ross's trial is set for November 19, 2024 in Fargo, North Dakota. He requests that the trial be continued for three months so that he can continue to work on resolving the matter via a global resolution that includes pleading guilty in another federal criminal case in this district.¹

Counsel has advised Mr. Ross of this motion, its purpose, and his constitutional and statutory right to a speedy trial under 18 U.S.C. § 3161 et seq. Mr. Ross has consented to a continuance and a written consent form will be filed in the coming days. Counsel also represents to the Court this motion is made neither for undue delay nor other improper reason. The government, through

¹ That case is criminal number 3-22-cr-184.

Assistant United States Attorney, Brett Shasky, doesn't object to this motion.

Nor do any of the codefendants in this matter.

For this reason, Dominick Ross requests that the Court reschedule his trial to the first available date after February 1, 2025.

Date: November 1, 2024

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dane", with a large, stylized loop at the beginning and a horizontal stroke extending to the right.

Dane DeKrey
Ringstrom DeKrey PLLP
814 Center Avenue, Suite 5
Moorhead, MN 56561-0853
dane@ringstromdekrey.com